3/10/2022

U. S. Department of Transportation Docket Operations
West Building Ground Floor, Room W12-140, 1200 New Jersey Ave., SE,
Washington, DC 20590

Re: Petition for Exemption under Part 11 of the Federal Aviation Regulations from 14 CFR § 61.3(a)(1)(i); 91.7(a); 91.109(a); 91.119(c); 91.121; 91.151(b); 91.403(b); 91.405(a); 91.407(a)(1); 91.409(a)(1) and (2); 91.417(a) and (b); 137.19(c) and (d); 137.19(e)(2)(ii), (iii), and (v); 137.31(a) and (b); 137.33(a) and (b); 137.41(c), and 137.42.

PETITION FOR EXEMPTION

To whom it may concern:

Tennessee Agri-Drone LLC petitions for an exemption of the listed Federal Aviation Regulations ("FARs") to conduct Agricultural Unmanned Aircraft System (UAS) for the purpose of Aerial Applications utilizing UAS weighing greater than 55 pounds. The Federal Aviation Administration (FAA) is authorized to grant this petition under 49 U.S.C. 44701(f), 44807, and 14 C.F.R. Part 11.

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QUICK REFERENCE SUMMARY

Tennessee Agri-Drone LLC petitions approval from the FAA to conduct large UAS operations In Accordance With (IAW) the standards and guidelines similar to previously granted exemption to DroneXum Exemption No. 18413A. However, the aircraft proposed is the DJI AGRAS T30. The Petitioner requests expedited approval as this request is non-precedent setting.

Aircraft: DJI Agras T30
Weight: Up to 171.96 lbs
ConOps: IAW restrictions listed in Exemption #18413A
Single Aircraft per RPIC
Rural / Sparsely Populated area
Agricultural Aerial Applications

We are confidentially submitting the following information in support of this petition:

- Tennessee Agri-Drone LLC T30 Standard Operating Procedures
- Tennessee Agri-Drone LLC T30 Safety Guide
- Tennessee Agri-Drone LLC T30 Training Guide
- Tennessee Agri-Drone LLC DJI Agras T30 Flight Log Form
- Tennessee Agri-Drone LLC DJI Agras T30 Economic Poison Form
- Tennessee Agri-Drone LLC DJI Agras T30 Spreading Form
- Tennessee Agri-Drone LLC DJI Agras T30 Maintenance Form
- Tennessee Agri-Drone LLC DJI Agras T30 Accident Reporting Form
- Tennessee Agri-Drone LLC Pre/Post-Flight Checklist
- DJI's Official Agras T30 Manuals

The documents are presented on a confidential basis under separate cover, in accordance with 14 C.F.R. 11.35(b). They contain confidential proprietary information to which Tennessee Agri-Drone LLC reserves all rights. The documents contain information that is not generally available to the public and is therefore exempt from disclosure under the Freedom of Information Act, 5 U.S.C. 552 et seq.

BACKGROUND OF PETITIONER AND UAS MANUFACTURER:

Tennessee Agri-Drone LLC, i.e., the petitioner, wishes to provide commercial agricultural UAS application services. Corren Tippitt, the owner/founder of Tennessee Agri-Drone LLC, is an agronomist with years of professional experience working with agricultural chemicals and ground-based equipment. Master Sergeant Kent McDonald (retired), the Petitioner's chief pilot, flew the MQ-1C Gray Eagle UAS while serving with the United States Army Special Operations Aviation Regiment. With their combined knowledge, expertise, and its organizational infrastructure, Tennessee Agri-Drone LLC is confident to undertake safe, legal, and effective precision aerial application operations. Tennessee Agri-Drone LLC has chosen the DJI Agras T30 platform because it is the most capable drone of its type.

Shenzhen DJI Sciences and Technologies Ltd., better known as DJI, which stands for Dà-Jing Innovations ("Great Frontier Innovation"), (i.e., the UAS manufacturer), is a Chinese technology corporation headquartered in Shenzhen, Guangdong, with manufacturing facilities located throughout the world. DJI is a market leader in commercial UAS (colloquially referred to as "drones") for aerial photography and filmmaking. Additionally, it develops and manufactures camera gimbals, action cameras, stabilizers, flight platforms and propulsion systems, as well as flight control systems. DJI is the undisputed market leader in the civilian drone sector, accounting for more than 70% of the global drone market. Its drone technology has been employed around the world. Furthermore, DJI has logged over 8,000 hours of testing on the DJI Agras T30 since its debut, with approximately 1500 units sold globally (the majority in China and Japan) and an estimated 800,000 hours flown safely by consumers worldwide. In the United States, the T30 represents a significant development in agricultural spraying/spreading applications.

PETITIONER'S ADDRESS:

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REASONS WHY GRANTING THIS PETITION WOULD BE IN THE PUBLIC INTEREST

According to a USDA Economic Research Service estimate, commercial crop protection products are used on approximately 70% (286 million acres) of the United States' 408 million acres of cropland. Agricultural aviation treats 71 million acres of that each year. The majority is treated by vehicles and ground crews that must sometimes haul large chemical loads over oftentimes steep and treacherous terrain. The Petitioner will reduce both risk to ground crews and costs to growers by offering application services utilizing efficient, unmanned aerial sprayers.

Agriculture applications utilizing manned aircraft pose a danger of injury or death to their operators. The National Transportation and Safety Board commissioned a report in 2014 (SIR-1401) to investigate the underlying causes. The greater safety achieved by flying an unmanned aircraft, rather than a much bigger manned aircraft carrying fuel and crew, is safer and poses a significantly lower risk to workers and the general public. The UAS's smaller size and lack of pilots onboard decrease the risk to the crew in an emergency. In addition, unlike most manned aircraft, most UAS have multiple motors, allowing for some motor redundancy in the event of a malfunction. The Petitioner will use Lithium polymer batteries, which are less flammable and explosive than 100LL or Jet A fuel. If the UAS crashes, the chances of people and crew being injured by an explosion or fire are greatly diminished.

The Petitioner intends to employ the DJI Agras T30 to dispense economic poisons on behalf of private and commercial firms, as well as possible government organizations. In agriculture, economic poison is used to protect crops from weeds that compete for macro and micronutrients, pathogens that cause disease and infection, and herbivorous pests that consume them. These unwanted organisms can have a significant and irreversible decrease of crop health and yields, resulting in higher commodity prices for consumers. Economic herbicides and Pesticides are beneficial to the growing environment and increase yields. Furthermore, the Petitioner's efficient spot spraying methods via the T30 optimize herbicide application, reducing the negative impact of excess chemical application and residual chemicals leaching into the soil or running off into streams or the water table. Thus, agricultural fields can be treated with the UAS in a more ecologically sound manner, protecting nearby rivers from excessive chemical runoff, algae blooms, and other environmental challenges.

FEDERAL CODES TO AUTHORIZE EXEMPTIONS

49 U.S.C. § 44701

The FAA is authorized to grant exemptions from its safety regulations and minimum standards under 49 U.S.C. § 44701 ("Section 44701"), "if the Administrator finds the exemption is in the public interest," specifically section 44701(f) (authorizing the grant of exemptions from safety regulations and minimum standards under Section 44701(a) and (b) and Sections 44702-44716). Under 49 U.S.C. § 44701(f), the "Administrator may grant an exemption from a requirement of a regulation prescribed under subsection (a) or (b) of this section or any of sections 44702-44716 of [Title 49] if the Administrator finds the exemption is in the public interest."

49 U.S.C § 44807

The Special Authority for Certain Unmanned Systems (49 U.S.C. § 44807) grants the Secretary of Transportation the authority to use a risk-based approach to determine whether an airworthiness certificate is required for a drone to operate safely in the national airspace. Under this authority, the Secretary may grant exemptions to the applicable operating rules, aircraft requirements, and pilot requirements for a specific operation on a case-by-case basis. The Special Authority for Certain Unmanned Systems (49 U.S.C. § 44807) grants UAS operators safe and legal entry into the NAS upon consideration of its size, weight, speed, operational capability, proximity to airports and populated areas, and operation within visual line of sight. The FAA further may find that the UAS does not require "airworthiness certification under section 44704 of title 49, United States Code."

For the reasons addressed herein, this Petition qualifies for expedited approval of Petitioner's request for exemption under both 49 U.S.C § 44701 and 49 U.S.C § 44807.

THE PETITIONER REQUESTS EXEMPTION FROM THE FOLLOWING 14 C.F.R. PARTS 61, 91, AND 137 INTERRELATED PROVISIONS:

- 14 C.F.R. § 61.3 (a)(1)(i) Requirement for certificates, ratings, and authorizations.
- 14 C.F.R. § 91.7(a) Civil aircraft airworthiness.
- 14 C.F.R. § 91.109(a) Flight Instruction.
- 14 C.F.R. § 91.119(c) Minimum safe altitudes.
- 14 C.F.R. § 91.121 Altimeter settings.
- 14 C.F.R. § 91.151(b) Fuel requirements for flight in VFR conditions.
- 14 C.F.R. § 91.403(b) General.
- 14 C.F.R. § 91.405(a) Maintenance required.
- 14 C.F.R. § 91.407(a)(1) Operation after maintenance, preventive maintenance, rebuilding, or alteration.
- 14 C.F.R. § 91.409(a)(1) and (2) Inspections.
- 14 C.F.R. § 91.417(a) and (b) Maintenance records.
- 14 C.F.R. § 137.19 (c), (d) and (e)(2)(ii)(iii) and (v) Certification requirements.
- 14 C.F.R. § 137.31 (a) and (b) Aircraft requirements.
- 14 C.F.R. § 137.33 (a) and (b) Carrying of certificate.
- 14 C.F.R. § 137.41 (c) Personnel, Pilot in command.
- 14 C.F.R. § 137.42 Fastening of safety belts and shoulder harnesses.

REASONS THE PETITIONER'S REQUEST FOR EXEMPTION FROM THE REGULATIONS AND HOW THE PETITIONER WOULD PROVIDE AN EQUIVALENT LEVEL OF SAFETY

14 C.F.R. § 61.3(a)(1)(i) - Part 61 Requirement for Certificates, Ratings, and Authorizations.

14 C.F.R. 61.3(a)(1)(i) states: "(a) No person may serve as a required pilot flight crewmember of a civil aircraft of the United States, unless that person:
(1) Has in the person's physical possession or readily accessible in the aircraft when exercising the privileges of that pilot certificate or authorization - **(i)** A pilot certificate issued under this part and in accordance with § 61.19"

14 C.F.R. 61.19 does not include a remote pilot certificate; hence, to comply with 61.3, the pilot would need to earn a Part 61 pilot certificate, which would be time-consuming. Additionally, this petition should be granted because the FAA stated in Exemption # 18009 (allowing a remote pilot certificate for Part 91 drone spraying operations), "Based on the specific requirements imposed by the remote pilot in command certificate, the Petitioner's hiring, training and testing protocols, the knowledge and skill requirements in § 137.19, the remote, controlled locations and extremely low- altitude operating environment, the FAA concludes pilots who hold a remote pilot in command (PIC) certificate can safely conduct the proposed operations." Similarly, the Petitioner's Training Guide, 137.19 knowledge and competence requirements, extremely low

altitude operations, and use of existing remote pilot certification would all provide an equivalent level of safety to the regulations.

14 C.F.R. § 91.7(a) - Civil Aircraft Airworthiness.

91.7(a) says, "No person may operate a civil aircraft unless it is in an airworthy condition."

The FAA is not required to grant an airworthiness certificate for the proposed unmanned aircraft, and the DOT may evaluate whether the proposed aircraft requires airworthiness certificates under Section 44807. Paragraph (a) of Section 91.7 requires the PIC to operate aircraft only when they are in an airworthy condition.

The FAA previously approved exemptions from 91.7(a) for unmanned aircraft sprayers weighing 55 pounds or more in Exemption #18009. The proposed restrictions in Exemption #18413A, in conjunction with the confidentially supplied related manuals, will provide an equivalent degree of safety to the regulations.

The Petitioner is asking for an exemption from this regulation due to the lack of a standard airworthiness certificate for the proposed unmanned aircraft. While the DJI Agras T30 will not have an airworthiness certificate, the pilot may assess that the aircraft is airworthy prior to flight. This is achieved by following the Petitioner's routine pre-flight checklist, regularly scheduled maintenance, and the Petitioner's Pilot Training Program.

14 C.F.R. § 91.109(a) – Flight Instruction.

91.109(a) says, "(a) No person may operate a civil aircraft (except a manned free balloon) that is being used for flight instruction unless that aircraft has fully functioning dual controls." Flight instruction for UASs is not defined in Part 91 or in Section 1.1. A literal reading of the regulation would require the aircraft to have dual remote controls. This is a burdensome regulation and does not affect safety when no flight crew members will be physically on board the aircraft.

Student flight instruction, both their initial and recurrent training, is essential to maintain safety during Part 137 operations. Having a secondary controller for use as a training "buddy box" device may be impractical because some unmanned aircraft's software may not support connecting two controllers in such a fashion. An equivalent level of safety to the regulations can be achieved by requiring the flight instructor to be in close enough proximity to the student pilot to be able to take immediate control of the unmanned aircraft's remote controller.

14 C.F.R. § 91.119(c) – Minimum Safe Altitudes.

Section 91.119(c) states, "**(c)** ***Over other than congested areas.*** An altitude of 500 feet above the surface, except over open water or sparsely populated areas. In those cases, the aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure."

The Petitioner requests an exemption from FAR 91.119(c) to allow UAS operations over non-congested regions at lower altitudes than allowed by rule. Operating at low altitudes is one of the main advantages of deploying UAS for agricultural purposes. An equivalent or higher level of safety will be obtained owing to the relatively small size, lower weight, and slower movement speed of the UAS.

The Petitioner's spraying activities normally maintain an altitude of 5-20 feet above ground level (AGL). When commanding the UAS to return to home, the UAS ascends to a predetermined safe altitude above the height of potential hazards or obstructions before returning to its launch location. In the typically remote and sparsely populated operational area, flying low boosts efficiency without increasing risk to persons or property. Even at these low altitudes, the Petitioner's UAS operations will be as safe as manned aircraft doing equivalent tasks at the altitudes specified by FAR 91.119.

To ensure the safety of all persons and property in the air and on the ground, including participating and non-participating personnel and other UAS, a visual observer (VO) will be used to assist in the operation of the remote pilot in command (RPIC).

14 C.F.R. § 91.121 - Altimeter Settings.

Section 91.121 states, "Each person operating an aircraft shall maintain the cruising altitude or flight level of that aircraft, as the case may be, by reference to an altimeter that is set, when operating. . ."
Section 91.121 requires each person operating an aircraft without a radio to maintain cruising altitude by reference to a barometric altimeter that is set "to the elevation of the departure airport or an appropriate altimeter setting available before departure."

In Exemption # 18009, the FAA determined that because of the limited altitude of the drone spraying operations, using ground positioning system (GPS) instead of a barometric altimeter is considered safe. Based upon the proposed restriction in Exemption # 18413A and the submitted supporting documents, the Petitioner requests a similar regulatory framework so that an equivalent level of safety can be achieved.

14 C.F.R. § 91.151(b) - Fuel requirements for flight in VFR conditions.

Section 91.151(b) states, "No person may begin a flight in a rotorcraft under VFR conditions unless (considering wind and forecast weather conditions) there is enough fuel to fly to the first point of intended landing and, assuming normal cruising speed, to fly after that for at least 20 minutes"

The T30 will not have the requisite 20 minutes of flight time while carrying a payload, even with the battery fully charged. It would be burdensome to comply with this regulation considering the operational environment, the relatively small size of the UA compared to manned aircraft, and that there are no people onboard the aircraft. Although the aircraft the Petitioner operates is

different, the proposed restriction 22 in Exemption # 18413A is determined to be an equivalent level of safety as 91.151(b), and the Petitioner hereby requests a similar regulatory framework.

14 C.F.R. § 91.403(b); § 91.405 (a); § 91.407 (a) (1); § 91.409 (a); § 91.417(a) & (b): Inspections, Maintenance, Preventive maintenance, Repair and Records.

These regulations should be viewed holistically in that they require the owner/operator to maintain/repair "Aircraft having a U.S. airworthiness certificate," as well as to keep records of such maintenance/repairs using Part 43 and qualified personnel. While this makes sense for certified manned aircraft, it does not always make sense for unmanned aircraft that do not have airworthiness certificates.

The aircraft's manufacturer and operator are in the best position to determine an aircraft's airworthiness. The Petitioner proposes that the confidentially supplied operational documents and regulatory framework like the proposed restrictions in exemption numbers 18413A and 18596 provide an equivalent level of safety to the regulations.

14 C.F.R. § 137.19(c), 137.41(c) Pilot in command certificates.

Section 137.19(c) states, “The applicant must have available the services of at least one person who holds a current U.S. commercial or airline transport pilot certificate and who is properly rated for the aircraft to be used. The applicant himself may be the person available.”

Section 137.41(c) states, “No person may act as pilot in command of an aircraft unless he holds a pilot certificate and rating prescribed by § 137.19 (b) or (c), as appropriate to the type of operation conducted. In addition, he must demonstrate to the holder of the Agricultural Aircraft Operator Certificate conducting the operation that he has met the knowledge and skill requirements of § 137.19(e).”

As previously granted in exemptions Exemption # 18413A demonstrate, an equivalent level of safety to the regulations can be achieved by requiring a remote pilot certificate, conducting operations in accordance with Part 91 & 137, obtaining an agricultural aircraft operations certification prior to conducting operations, and enforcing the proposed restrictions from Exemption # 18413A.

14 C.F.R. § 137.19(d) Aircraft and 137.31(a) Aircraft Certification Requirements.

Section 137.19(d) states, “The applicant must have at least one certificated and airworthy aircraft, equipped for agricultural operation.”

Section 137.31(a) states, “No person may operate an aircraft unless that aircraft -

(a) Meets the requirements of § 137.19(d);”

The proposed unmanned aircraft lacks certification and obtaining certification would be extremely difficult. If 137.19(d) is exempt, then 137.31(a) must be exempt as well, as it involves meeting the requirements in 137.19(d).

Operating under the proposed restrictions allowed by the FAA in Exemption #18413A provides an equivalent degree of safety of 137.19(d). It is sufficient to determine the airworthiness of the aircraft based on the requirements in the manuals, Part 91 requirements for pilot pre-flight inspections, and the agricultural aircraft operator certificate requirements. The public is also at less risk from unmanned aircraft operations because these UA are small and only operate in restricted places for short periods of time. Moreover, the Petitioner is best qualified to keep the aircraft in airworthy condition to meet the laws' safety requirements.

14 C.F.R. § 137.19(e)(2)(ii), (iii), and (v) Skills Test.

Section 137.19(e)(2) states, "The test of skill consists of the following maneuvers that must be shown in any of the aircraft specified in paragraph (d) of this section, and at that aircraft's maximum certificated take-off weight, or the maximum weight established for the special purpose load, whichever is greater:

(ii) Approaches to the working area.

(iii) Flare-outs.

(v) Pullups and turnarounds."

Paragraphs (e)(2)(ii), (iii), and (v) of section 137.19 are superfluous and do not apply to unmanned aircraft. As stated by the FAA in Exemption # 17261, "the FAA has determined that demonstration of the skills described in these paragraphs is not necessary because they are not compatible or applicable to" multi-rotor unmanned agricultural aircraft operations.

Furthermore, in Exemption # 18009 the FAA stated, "Granting relief from a demonstration of the skills described in § 137.19(e)(2)(ii), (iii), and (v) does not adversely impact safety because the operations . . . under this exemption would not include any exercise of those maneuvers."

Equivalent levels of safety can be achieved by the Petitioner by requiring:

- The remote PIC to possess a valid remote pilot certificate,
- The Petitioner obtaining an agricultural aircraft operations certificate before operations, and
- The Petitioner to go through training and certification procedure stated in the Petitioner's operating documentation provided.

14 C.F.R. § 137.31(b), and 137.42. Safety Belts and Shoulder Harnesses.

Section 137.31(b) states, "Is equipped with a suitable and properly installed shoulder harness for use by each pilot."

Section 137.42 states, “No person may operate an aircraft in operations required to be conducted under part 137 without a safety belt and shoulder harness properly secured about that person except that the shoulder harness need not be fastened if that person would be unable to perform required duties with the shoulder harness fastened.”

These regulations are intended to safeguard persons on board aircraft. Because there will be no people on board, there is no need for safety belts. However, as required, the Petitioner seeks an exemption from these requirements. As a result, a comparable level of safety can be achieved by flying within the constraints in FAA Exemption # 18413A.

14 C.F.R. § 137.33(a) and (b) Carrying of certificate.

Section 137.33 states, “**(a)** No person may operate an aircraft unless a facsimile of the agricultural aircraft operator certificate, under which the operation is conducted, is carried on that aircraft. The facsimile shall be presented for inspection upon the request of the Administrator or any Federal, State, or local law enforcement officer.

(b) Notwithstanding part 91 of this chapter, the registration and airworthiness certificates issued for the aircraft need not be carried in the aircraft. However, when those certificates are not carried in the aircraft they shall be kept available for inspection at the base from which the dispensing operation is conducted.”

Petitioner seeks relief from 137.33(a) Certificate Carrying, which requires an agricultural aircraft operator certificate to be carried on board. The FAA previously decided that exemptions from 91.9(b)(2) and 91.203(a) and (b) for aircraft flight manuals and registration are not required. Per the FAA's prior analysis, an exemption is warranted here if the remote PIC has access to a facsimile of the agricultural aircraft operator certificate and all registration certificates on hand. Finally, because the Petitioner UAS will not have an airworthiness certificate, exemption from 137.33(b) Certificate Carrying is required. The Petitioner will retain registration credentials on hand.

The Petitioner has sought to determine the relevant C.F.R.s from which an exemption is required to execute the proposed operations. If the FAA concludes that the Petitioner requires an exemption from other C.F.R.s not specifically addressed or specified in order to perform the proposed operations, the Petitioner requests an exemption from those FARs as well.

14 C.F.R. § 137.41(c) Pilot in command.

Section 137.41(c) states, “No person may act as pilot in command of an aircraft unless he holds a pilot certificate and rating prescribed by § 137.19 (b) or (c), as appropriate to the type of operation conducted. In addition, he must demonstrate to the holder of the Agricultural Aircraft Operator Certificate conducting the operation that he has met the knowledge and skill requirements of § 137.19(e). If the holder of that certificate has designated a person under § 137.19(e) to supervise his agricultural aircraft operations the demonstration must be made to the person so designated. However, a demonstration of the knowledge and skill requirement is not necessary for any pilot in command who -

(1) Is, at the time of the filing of an application by an agricultural aircraft operator, working as a pilot in command for that operator; and

(2) Has a record of operation under that applicant that does not disclose any question regarding the safety of his flight operations or his competence in dispensing agricultural materials or chemicals."

This regulation requires an exemption for the same reasons as Section 137.19(c) and Section 137.19(e)(2)(ii)- (v). The proposed restrictions included in Exemption # 18413A by the FAA can provide a comparable degree of safety, and the Petitioner thus requests a similar regulatory framework. Additionally, each pilot in command must possess a remote pilot certificate and have successfully completed training.

CONDITIONS AND LIMITATIONS

The Petitioner agrees to carry out the proposed operations in accordance with the same applicable conditions and limitations ("Limitations") as set forth in the previous DroneXum Exemption # 18413A, unless specifically exempted as requested earlier in this document.

FEDERAL REGISTER SUMMARY

As required by 14 C.F.R. Part 11, below is provided a summary of the petition to be published in the Federal Register should it be determined that publishing is needed.

The Petitioner is seeking an exemption from the following rules:

Petition for Exemption under Part 11 of the Federal Aviation Regulations from 14 CFR § 61.3(a)(1)(i); 91.7(a); 91.109(a); 91.119(c); 91.121; 91.151(b); 91.403(b); 91.405(a); 91.407(a)(1); 91.409(a)(1) and (2); 91.417(a) and (b); 137.19(c) and (d); 137.19(e)(2)(ii), (iii), and (v); 137.31(a) and (b); 137.33(a) and (b); 137.41(c), and 137.42 to fly unmanned aircraft weighing over 55 pounds for agricultural aircraft operations.

The Petitioner seeks an exemption to operate Unmanned Aircraft Systems (UAS) weighing 55 pounds or more, but not more than 171.96 pounds, in the United States for the purpose of providing commercial agricultural-related services. The desired relief is analogous to the regulatory framework provided under Exemption No. 18413A.

OPERATING PROCEDURES

The Petitioner will only operate within the restrictions imposed by the FAA's exemption and the aircraft limitations outlined in the accompanying manuals. In the event of a discrepancy between the FAA's limitations and those in the manuals, the Petitioner will follow the more restrictive of these. Furthermore, all crew members operating under the Petitioner will receive the Petitioner's training.

CONCLUSION

The operation of Tennessee Agri-Drone LLC employing unmanned aircraft for agricultural aircraft flight services, as stated above, will provide a comparable degree of safety to the restrictive requirements; thus, this petition should be granted immediately.

Sincerely
Corren Tippitt
Owner/Founder
Tennessee Agri-Drone LLC